

Thurman King v. City of Rockford, et al.

U.S.D.C. Western District of Michigan Case No. 1:21-cv-259

Honorable Jane M. Beckering

Plaintiff's Response in Opposition to Defendants' Motion for Summary Judgment

Exhibit 6

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

THURMAN KING,

Plaintiff,

vs.

Case No. 1:21-cv-259

Hon. Paul L. Maloney

CITY OF ROCKFORD; ROCKFORD

DEPARTMENT OF PUBLIC SAFETY;

OFFICER ZACHARY ABBATE (individually);

and OFFICER JASON BRADLEY (individually),

Defendants.

VIDEOTAPED DEPOSITION

DEPONENT: JASON BRADLEY

DATE: Wednesday, January 5, 2022

TIME: 2:53 p.m. EST

LOCATION: Via Zoom videoconference

REPORTER: Elizabeth G. LaBarge, CSR-4467

JOB NO: 17021

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BRADLEY, JASON 01/05/2022

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1 wouldn't have made sense to put additional pressure on
2 top of him.

3 Q You are indicating, though, under oath, clearly, that at
4 no time did you put your knee on Mr. King's back while
5 he was on the ground; is that correct?

6 A Correct.

7 Q You did hear him saying on a number of occasions, "I
8 can't breathe"?

9 A Yes.

10 Q There was someone that said, "If you're talking, you can
11 breathe, buddy," or, "If you're talking, you can
12 breathe, pal," or, "If you're able to talk, you can
13 breathe, buddy," or pal, something along that line. Was
14 that you that said that?

15 A Yes. I did it in an effort to give him peace of mind, I
16 was trying -- I was trying to ease the situation and
17 essentially give him encouragement, hoping he would hear
18 me and hoping that he would know that it was going to be
19 okay.

20 Q You're familiar, I assume now, with the Floyd incident
21 where he was saying, "I can't breathe," and an officer
22 was saying something similar to, "If you can talk, you
23 can breathe," and he died? I mean, it's been all
24 through the news and papers. You're generally familiar
25 with that occurring?

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1 State of Michigan)

2 County of Oakland)

3 Certificate of Notary Public - Court Reporter

4
5 I certify that this transcript is a complete, true, and
6 correct record of the testimony of the witness held in this
7 case.

8
9 I also certify that prior to taking this deposition, the
10 witness was duly sworn or affirmed to tell the truth.

11
12 I further certify that I am not a relative or an
13 employee of or an attorney for a party; and that I am not
14 financially interested, directly or indirectly, in the
15 matter.

16
17 I hereby set my hand this 13th day of January, 2022.

18
19
20
21 *Elizabeth G. LaBarge*

22 Elizabeth G. LaBarge, CSR-4467

23 Certified Shorthand Reporter

24 Notary Public, Wayne County, Michigan